

Exhibit D

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

PETER FISCHER,)	
<i>individually and on behalf of all others</i>)	
<i>similarly situated,</i>)	No. 4:21-cv-02582-SEP
)	
Plaintiffs,)	This Document Applies To:
)	21-cv-00583
v.)	21-cv-00706
)	21-cv-00709
CONOPCO, INC., d/b/a “UNILEVER,”)	21-cv-00710
DOES 1 through 10,)	21-cv-00781
)	21-cv-00782
Defendants.)	21-cv-00888
)	21-cv-00892

DECLARATION OF Rob McCulley

1. My name is Rob McCulley. I am more than twenty-one years of age and am competent to make this declaration. This declaration is based upon my personal knowledge and I could and would testify competently hereto if called as a witness in this matter.

2. I am the Business Development Manager at Conopco, Inc., d/b/a Unilever (“Unilever”). I am responsible for our day to day business operations and financial management of the Walmart team.

3. From 8/10/2016 to the present time, Unilever has supplied antiperspirants and other personal care products to Walmart pursuant to a supplier agreement. These products include, but are not limited to, the Axe, Dove, and Degree brands.

4. The Walmart Terms of Use applicable to the website and the mobile app defines “Walmart Entities” as including “its suppliers, vendors, contractors and licensors.” Ex. 1.

5. Unilever is a “Walmart Entity” pursuant to the Walmart Terms of Use in effect during the period November 2020 through February 2021.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 12, 2021, in Benton County Arkansas.

Rob McCulley

Rob McCulley
Business Development Manager
Conopco, Inc.